

State Water Resources Control Board

November 6, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7016 3010 0000 5907 1844

Mr. Ray Manalo
Vehicle Maintenance Supervisor
Twin Rivers Unified School District
1400 Grand Avenue, Suite B
Sacramento, California 95683
raymond.manalo@twinriversusd.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT TWIN RIVERS TRANSPORTION, 1400 GAND AVENUE,
SACRAMENTO**

Dear Mr. Manalo:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 25, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, such as the street was not available in CERS or onsite at the time of the inspection.	All	October 25, 2017	Ongoing	H&SC 25286(a); 23 CCR 2711(a)(8)
2	Failure to Maintain Operating Permit Onsite – A copy of the operating permit was not onsite at the time of inspection.	All	October 25, 2017	Ongoing	H&SC 25284(a); 23 CCR 2712(i)
3	Failure to Maintain Evidence of Financial Responsibility – A current Certificate of Financial Responsibility was not in CERS or onsite at the time of inspection.	All	October 25, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 I Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Monitor Product Piping – The sensor inside the unleaded under dispenser containment (UDC) is unable to detect a leak at the earliest opportunity because the sensor is not in a vertical position.	Unleaded	October 25, 2017	Ongoing	23 CCR 2630(d)
5	Failure to Tag Monitoring Equipment – A current annual monitoring certification tag was not observed attached to the diesel or unleaded annular sensors. Additionally, tags were not observed attached to the sensors located in either UDCs or the monitoring system panel.	All	October 25, 2017	Ongoing	23 CCR 2638(f)
6	Failure to Maintain Monitoring Plan – In the monitoring plan under pipe monitoring, both tanks should list “yes” under “other monitoring” and list the Veeder Root 205 sensor for the vent piping sumps. Additionally, the unleaded tank should list the Veeder Root 405 sensor under continuous electronic tank monitoring.	All	October 25, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Sacramento County Environmental Management Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Ms. Jennea Monasterio
Environmental Specialist
Sacramento County Environmental
Management Department
10590 Armstrong Avenue, Suite A
Sacramento CA, 95655
monasterioj@saccounty.net

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amantha Henkel". The signature is stylized with a large, sweeping initial "A" and a cursive "H".

Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Jennea Monasterio
Environmental Specialist
Sacramento County Environmental
Management Department
monasterioj@saccounty.net